

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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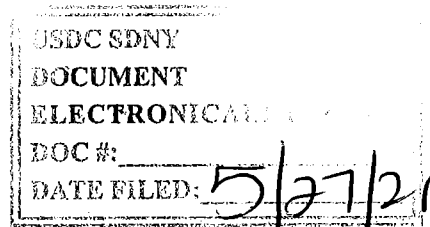
UNITED STATES OF AMERICA

- v. -

EDUARDO TALENTINO,

Defendant.

- - - - -x



: SUPERSEDING INFORMATION

: S1 20 Cr. 31 (VB)

:

COUNT ONE

(Possession of Child Pornography)

The United States Attorney charges:

1. On or about February 8, 2019, in the Southern District of New York, EDUARDO TALENTINO, the defendant, knowingly did possess, and knowingly did access with intent to view, a book, magazine, periodical, film, videotape, computer disk, and other material containing an image of child pornography that had been mailed, and shipped and transported using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, to wit, TALENTINO possessed images of child pornography, including images of prepubescent minors and minors

who had not attained 12 years of age, on a phone located in Orange County, New York.

(Title 18, United States Code, Section 2252A(a)(5)(B)
and (b)(2).)

COUNT TWO

(Felon in Possession)

The United States Attorney further charges:

2. From in or about August 2018, up to and including in or about February 2019, in the Southern District of New York, EDUARDO TALENTINO, the defendant, knowing that he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, to wit: a Colt Pocket Positive .32 caliber revolver; and the firearm was in and affecting commerce.

(Title 18, United States Code, Sections 922(g)(1) and 2.)

COUNT THREE

(Failure to Register)

The United States Attorney further charges:

3. From in or about at least July 2018, up to and including at least in or about February 2019, in the Southern District of New York and elsewhere, EDUARDO TALENTINO, the defendant, being an individual required to register under the Sex Offender Registration and Notification Act ("SORNA"), traveled in interstate and foreign commerce and knowingly failed to register

and update a registration as required by SORNA, to wit, TALENTINO, who is required to register as a sex offender under SORNA, traveled from Orange County, New York to West Virginia and returned to Orange County, New York, and failed to register as a sex offender in New York upon his return.

(Title 18, United States Code, Section 2250(a).)

FORFEITURE ALLEGATION

4. As a result of committing the offense alleged in Count One of this Information, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2428, any and all property, real and personal, constituting or derived from proceeds obtained, directly or indirectly, as a result of said offense; and any and all property, real or personal, that was used or intended to be used to commit or facilitate the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense and the following specific property:

(1) a Black Samsung cellphone, Model SM-J727T1, IMEI 357847092263287 and (2) a Gold Motorola cellphone, Model XT1765, IMEI 354135092795331 (collectively the "Specific Property").

Substitute Assets Provision

5. If the above-described forfeitable property, as a result of any act or omission of the defendant:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third person;
- c) has been placed beyond the jurisdiction of the Court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 2428;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)

Audrey Strauss

AUDREY STRAUSS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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UNITED STATES OF AMERICA

v.

EDUARDO TALENTINO,

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INFORMATION

S1 20 Cr. 31 (VB)

(18 U.S.C. §§ 2, 2252A(a)(5)(B),
2252A(b)(2), 922(G), 2250(a)

AUDREY STRAUSS

United States Attorney
